

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PETITION OF BELLSOUTH)	
TELECOMMUNICATIONS, INC. TO ESTABLISH)	
GENERIC DOCKET TO CONSIDER AMENDMENTS)	CASE NO.
TO INTERCONNECTION AGREEMENTS)	2004-00427
RESULTING FROM CHANGES OF LAW)	
)	

MOTION FOR FULL INTERVENTION

Pursuant to 807 KAR 5:001, Section 3(8), the Competitive Carriers of the South, Inc. (“CompSouth”)¹ submits this motion for full intervention in the above-captioned proceeding.

CompSouth is an association of certified, competing local service providers, many of which operate in Kentucky. Various individual members of the association have interconnection agreements with BellSouth Telecommunications, Inc., the Petitioner in this matter. While certain of CompSouth’s members are participating individually in Kentucky and/or other states, other members are not able to participate individually in each of the numerous state regulatory proceedings arising from the BellSouth Petition, which BellSouth filed in nine states. Participation by CompSouth on behalf of these members is likely to present issues that will assist

¹ CompSouth’s members participating in this filing include the following companies: Access Point Inc., AT&T Communications of the South Central States, LLC, Cinergy Communications Company, DIECA Communications, Inc., d/b/a Covad Communications Company, Dialog Telecommunications, Inc., IDS Telecom LLC, InLine, ITC^DeltaCom, LecStar Telecom, Inc., MCI, Momentum Telecom, Inc., Navigator Telecommunications, LLC, Network Telephone Corp., Nuvox Communications, Inc, Talk America, Trinsic Communications, Inc., and Xspedius Communications, LLC. CompSouth is presenting a collective position with regard to the issues in this proceeding; as to some issues, individual member carriers may have negotiated (or are in the process of negotiating or arbitrating) different language with BellSouth.

the Commission without unduly complicating the proceedings. Pursuant to the Commission's procedural schedule CompSouth intends to present direct testimony and participate in the hearing. In addition, on a region-wide basis CompSouth has worked directly with BellSouth for the purpose of coordinating discovery and hearing schedules. Accordingly, intervention by CompSouth is consistent with the region-wide agreements related to scheduling and other matters.

CompSouth agrees to accept electronic service of pleadings and other documents via notice from the Commission to:

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For the reasons stated above, CompSouth asks that this Motion for Full Intervention be granted.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion for Intervention has been filed electronically as permitted by the procedural order governing Case No. 2004-00427 this 16th day of August, 2005.

Douglas F. Brent